

Lexington-Fayette Urban County Government DEPARTMENT OF LAW

Jim Gray Mayor Janet M. Graham Commissioner

August 16, 2011

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AUG 1 7 2011

PUBLIC SERVICE

COMMISSION

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602-0615

Re: Case No. 2011-00161

(Kentucky Utilities - Environmental Surcharge Recovery)

Dear Mr. Derouen:

Please find enclosed herewith for filing in the referenced matter an original and 10 copies of Lexington-Fayette Urban County Government's Supplemental Requests for Information.

Yours truly,

David J. Barberie Attorney Senior

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cc: Case Distribution List

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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

in the Matter of.			RECEIVED
APPLICATION OF KENTUCKY UTILITIES)		
COMPANY FOR CERTIFICATES OF PUBLIC)		AUG 1 7 2011
CONVENIENCE AND NECESSITY AND)	CASE NO.	MOG I T III
APPROVAL OF ITS 2011 COMPLIANCE PLAN)	2011-00161	PUBLIC SERVICE
FOR RECOVERY BY ENVIRONMENTAL)		COMMISSION
SURCHARGE)		

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S SUPPLEMENTAL REQUESTS FOR INFORMATION

Comes now the Lexington-Fayette Urban County Government ("Lexington"), by counsel and pursuant to the Public Service Commission's Scheduling Order, and submits its Supplemental Requests for Information to the Joint Applicants to be answered in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the company witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from legal counsel for Lexington.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

- (7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify legal counsel for Lexington as soon as possible.
- (8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.
- (9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S SUPPLEMENTAL REQUESTS FOR INFORMATION

- 1. Please refer to your response to Commission Staff's First Information Request No.1, and provide the information requested in item 1(a) for an electric customer served under the rate schedule for Power Service (PS).
 - 2. What is the anticipated bill impact of the application upon each public street light tariff?

Respectfully submitted,

BY:

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Director of Litigation

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Attorneys for Lexington-Fayette Urban County

Government

FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of these Supplemental Requests for Information were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, and/or by electronic means, as further indicated below, all on this the 16th day of August, 2011:

Mr. Lonnie Bellar Vice President, State Regulation & Rates LG&E and KU Services Company 220 West Main Street P.O. Box 32010 Louisville, Kentucky 40202-201

Hon. Kendrick R. Riggs Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, Kentucky 40202-2828

Mr. Robert M. Conroy Director, Rates Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, Kentucky 40202

Hon. Allyson K. Sturgeon Senior Corporate Attorney LG&E and KU Services Company 220 West Main Street Louisville, Kentucky 40202

Hon. Dennis G. Howard, II Hon. Larry Cook Assistant Attorneys General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive, Suite 200 Frankfort, Kentucky 40601-8204 Hon. David Brown Stites & Harbison, PLLC 1800 Providian Center 400 West Market Street Louisville, Kentucky 40202

Hon. Michael Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 E. Seventh Street Suite 1510 Cincinnati, Ohio 45202

Hon. Iris G Skidmore 415 W. Main Street Suite 2 Frankfort, Kentucky 40601

Hon. Edward G. Zuger, III Zuger Law Office PLLC P.O. Box 728 Corbin, Kentucky 40702

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ATTORNEY FOR LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT